

Drawings

In numbered paragraph 1 of the Official Action, the Examiner has indicated that the informal drawings filed with the present application are acceptable only for examination purposes. Applicants will submit formal drawings for consideration by the Examiner and the Draftsperson in response to receiving a notice indicating allowable subject matter for this application.

Title

In numbered paragraphs 2-3 of the Official Action, the Examiner alleged that the title of the application is not descriptive of the invention recited by the pending claim set. Applicants have amended the title of the present application based on the title suggested by the Examiner. Applicants respectfully submit that the amended title clearly indicates the invention defined by the claims of this application.

Informalities

In numbered paragraph 4 of the Official Action, the Examiner objected to Claims 11, 16, 19, 20, 21 and 24 based on certain informalities. Applicants have amended Claims 11, 16, 19, 20 and 24 and cancelled Claim 21 to address these informalities. These amendments do not affect the scope of the invention defined by these claims and are submitted to address the Examiner's objections rather than to distinguish the prior art references cited by the Examiner.

Section 112, Second Paragraph

The Examiner has rejected Claims 4, 5, 9, 14, 15, 18-21 and 25 under 35 U.S.C. § 112, second paragraph, based on the allegation that these claims are indefinite and failed to particularly point out and distinctly define the subject matter of the recited invention. Applicants

have amended Claims 4, 5, 9, 14, 15, 18-20 and 25 to overcome the Section 112, second paragraph rejection by precisely defining the scope of inventive subject matter. These amendments, however, are not submitted to address the prior art references located by the Examiner, nor are these amendments necessary to distinguish the recited inventions from these prior art references.

Section 101

The Examiner has rejected Claim 21 under 35 U.S.C. § 101 in numbered paragraph 17 of the Official Action. The Examiner has alleged that the invention defined by Claim 21 is directed to non-statutory subject matter. Without addressing the merits of the rejection raised by the Examiner, Applicants have cancelled Claim 21 without prejudice and reserve the right to continue prosecution of the subject matter defined by this claim at a later date.

Section 102

In numbered paragraphs 18-30 of the Official Action, the Examiner has rejected Claims 1, 11, 14-20 and 22-24 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,093,787 to Simmons. In particular, the Examiner has alleged that the *Simmons* patent describes each and every recitation of the referenced claims. Applicants respectfully traverse the rejection of Claims 1, 11, 14-20 and 22-24 and request that the Examiner withdraw these claim rejections.

Independent Claim 1

The Examiner has alleged that the combination of lines 8-12 of the Abstract, Col. 17, line 56 (“transaction matching”), and the “Bank and Checkbook Balances” of Fig. 7 in the *Simmons* patent teach each and every recitation of Claim 1. Applicants respectfully submit that the

cited portions of *Simmons* fail to describe, teach, or suggest steps b, c, or d of Claim 21, which defines a method for substituting parameters of a field in a display screen area.

Contrary to the Examiner's assertion, the cited section of the *Simmons* Abstract fails to describe or suggest receiving an indication that a first field parameter displayed within the field of a display screen area has been changed to a second field parameter, as recited by step b of Claim 1. Instead, lines 11-12 of the *Simmons* Abstract describe identifying discrepancies between first and second data sets maintained in different memories and, if desired, automatically revising the first data set to conform to the second data set. Although *Simmons* teaches revising a first data set to conform to a second data set, there is no suggestion in the *Simmons* abstract that an indication is received to indicate this change of the first data set to conform to the second data set. Indeed, the *Simmons* patent teaches automatically revising the first data set to conform to the second data set, thereby eliminating any need to receive an indication that the first data set has been changed to the second data set. Consequently, Applicants respectfully submit that the *Simmons* patent fails to describe or suggest receiving an indication that the first field parameter has been changed to a second field parameter, as recited by Claim 1.

Although the Examiner has alleged that the Abstract and Col. 17, line 56 of the *Simmons* patent teaches step c of independent Claim 1, Applicants respectfully submit that the Examiner has overlooked a recitation of step c in Claim 1 in providing proper support for this anticipation-type rejection of Claim 1. In particular, Claim 1, step c, requires creating a link between first and second field parameters *in response to an indication that the first field parameter has been changed to the second field parameter*. Because the *Simmons* patent fails to describe or teach providing an indication that a first field parameter has been changed to a second field parameter, this patent also fails to suggest creating the recited link of Claim 1 in response to this indication of change between the first and second field parameters.

Moreover, Applicants respectfully submit that neither identifying discrepancies between first and second data sets nor transaction matching, as described by the *Simmons* patent, suggests creating a link between first and second field parameters for each occurrence of the first field parameter, as defined by step b of Claim 1. The transaction matching described in Col. 17 of the *Simmons* patent refers to the matching of financial transactions, typically by matching the transactions of different record systems by time and date, by merchant number, or by other transaction data (Col. 17, lines 12-16, 22-25, 29-39 and 56-62). For example, the transaction matching of *Simmons* refers to comparing the time and date of a financial transaction to a record maintained by a financial institution for transactions having time and date information. If the transaction information “matches” the transaction record, typically by time and date, then a transaction match arises in the *Simmons* system. Consequently, there is no teaching by the *Simmons* patent to create a link between first and second field parameters, as required by Claim 1, because the transaction matching operation completed by the *Simmons* patent is a comparison of data sets rather than a creation of a link between field parameters. Even assuming, for the sake of argument, that the Examiner’s interpretation of transaction matching in the *Simmons* patent is correct, it is respectfully submitted that the cited portions of *Simmons* fails to describe, teach, or suggest creating a link between first and second field parameters *for each occurrence of the first field parameter*, as defined by Claim 1.

Although the Examiner has alleged that Fig. 7 of the *Simmons* patent describes step d of Claim 1, Applicants respectfully submit that Fig. 7 merely illustrates displaying a checkbook and a bank balance. There is no suggestion by Fig. 7 of the *Simmons* patent to display a second field parameter *in the place* of a first field parameter in a field of a display screen area, as defined by Claim 1. In particular, capability of displaying a checkbook and a bank balance, as illustrated in Fig. 7 of the *Simmons* patent, is not suggestive of how that information is displayed on the display screen. Moreover, the *Simmons* patent fails to describe, teach, or suggest displaying the second

field parameter in the place of the first field parameter *in response to a link between these field parameters*.

In view of the foregoing, Applicants respectfully submit that the rejection of Claim 1 in view of the cited portions of the *Simmons* patent is improper and requests that this rejection be withdrawn. Applicants further request that the Examiner withdraw the rejection of the claims dependent from independent Claim 1, namely Claims 2 and 3.

Independent Claims 11, 16 and 20

The Examiner has alleged that the combination of specified portions of Columns 19, 20 and 21 and the "Checkbook and Bank Balances" display of Fig. 7 in *Simmons* describes each and every recitation of Claim 11. Applicants respectfully traverse this rejection of the invention recited by Claim 11. Although Claim 11 has been amended to correct an informality alleged by the Examiner, this Claim amendment is not submitted to clarify the scope of the recited invention in view of the cited art of record.

The Examiner has alleged that the electronic and automatic display means of the *Simmons* patent, which can automatically display identified discrepancies between first and second data sets, is equivalent to displaying a personal data store containing an opening balance, transactions organized by date, and an ending balance. Contrary to the Examiner's allegation, Applicants respectfully submit that neither the checkbook display in Fig. 7 nor the automatic display means recited by Claim 1 of the *Simmons* patent describes, teaches, or suggests displaying the personal data store defined by step a of Claim 11. In particular, the Examiner has failed to provide support for the assertion that *Simmons* describes a personal data store containing (1) an opening balance, (2) transactions organized by date *and* (3) an ending balance. The capability of displaying a checkbook balance or displaying identifying discrepancies between a pair of data sets in *Simmons* is not suggestive of displaying the personal data store expressly defined by Claim 11.

Likewise, the cited portions of the *Simmons* patent fail to teach downloading the on-line financial statement defined by step b of Claim 11, which requires a statement having transactions offered by date, an ending period *and* an ending balance. Instead, Col. 21, lines 28-30 of *Simmons* teaches receiving individual bank account transaction data transmitted by a bi-directional transmitter (without defining the characteristics of the bank account transaction data).

Claim 11, step c, requires comparing the earliest dated transaction of the personal data store to the earliest data transaction of the on-line financial statement to determine whether this personal data store transaction is later than the on-line financial statement transaction. The Examiner has asserted that specified portions of Cols. 19 and 20 of the *Simmons* patent describes the recited step c of Claim 11 because this patent teaches the combination of a clock and a transaction synchronization means. The clock in *Simmons* can generate data identifying the time and date that each checking account transaction is entered into a first processor (Col. 19, lines 49-53). The transaction synchronization means of *Simmons* can “operatively connect” first and second data sets, which contain time-stamped data, and a comparison means can reconcile on-line transactions, bill payments, and electronic cash register charges by time and date matching. Although *Simmons* teaches operating on time-stamp data and using time and date matching to facilitate reconciling financial transactions, there is no suggestion by this reference to conduct the operation recited by Claim 11, step c, namely comparing the *earliest* data transactions of a personal data store and an on-line financial statement to determine whether the personal data store transaction is later than the on-line financial statement transaction.

It is respectfully submitted that the Examiner has failed to provide support for the rejection of Claim 11 by referencing a prior art publication that teaches the comparison tasks of Claim 11, step c. A teaching of time and date matching by the *Simmons* patent would not lead one of ordinary skill in the art to compare the earliest data transaction of a personal data store and an on-line financial statement in the manner defined by step c of Claim 11. Likewise, the use of a

clock to identify the time and date that a checking account transaction is entered into a processor, as described by *Simmons*, does not result in the comparison of the earliest data transactions of a personal data store and an on-line financial statement in the manner defined by step c of Claim 11.

The Examiner has alleged that the *Simmons* patent describes step d of Claim 11 because this reference teaches the use of a comparison means to compare first and second sets of data. Contrary to the Examiner's assertion, Applicants respectfully submit that the comparison means of *Simmons* does not determine whether any transactions of an on-line financial statement have been downloaded into a personal data store, as recited by Claim 11, step d. Indeed, this cited portion of *Simmons* fails to describe, teach, or suggest making a determination of whether an on-line financial statement transaction has been downloaded into a personal data store in response to a comparison operation, as required by Claim 11. It is respectfully submitted that the comparison means of *Simmons*, as described by Col. 19, lines 8-11, is readily distinguishable from the determining step d of Claim 11, which is completed if the earliest data transaction in the personal data store is not later than the earliest data transaction in the on-line financial statement.

Because the *Simmons* patent fails to describe or suggest making a determination that none of the transactions of an on-line financial statement have been downloaded into a personal data store, Applicants respectfully submit that this reference fails to show calculating a correct beginning balance that is different from an opening balance, as recited by amended Claim 11. Moreover, identifying discrepancies between first and second sets of data, such as the data of a personal data store and an on-line financial statement, does not logically result in a suggestion of calculating a correct beginning balance that is different from an opening balance of the personal data store. In the absence of a teaching by *Simmons* to calculate a correct beginning balance, as recited by Claim 11, step e, Applicants respectfully submit that the rejection of Claim 11 is improper.

In view of the foregoing, Applicants respectfully submit that the anticipation-type rejection of Claim 11 is improper in view of the *Simmons* reference and requests that the Examiner withdraw this rejection. Applicants further respectfully request that the Examiner withdraw the rejections of the claims dependent from independent Claim 11, namely Claims 12-15.

Applicants understand that the Examiner has rejected independent Claims 16 and 20 under Section 102(b) for reasons similar to those presented with respect to the rejection of independent Claim 11 in view of the *Simmons* patent. Applicants respond to this rejection of Claim 16 and 20 by submitting that the remarks provided above to distinguish the invention of Claim 11 over the *Simmons* patent are applicable to the patentability of the inventions defined by independent Claims 16 and 20. Consequently, Applicants respectfully requests that the Examiner withdraw the rejection of independent Claims 16 and 20 and all claims dependent therefrom.

Independent Claim 22

The Examiner has rejected independent Claim 22 under Section 102(b) based on the assertion that *Simmons* patent describes each and every recitation of this claim. In particular, the Examiner has asserted that certain portions of Columns 17 and 19 of the *Simmons* patent describe a method for automatically correcting payee names, as defined by Claim 22. Although Col. 19, lines 4-7 of the *Simmons* patent describes electronically communicating a first data set from a first processor to a second processor, Applicants respectfully submit that this cited portion neither describes nor teaches downloading an on-line financial statement comprising original payee names from an on-line banking service, as recited by step a of Claim 22. While the cited portion of the *Simmons* patent teaches electronically communicating a generic data set between processors, the method defined by Claim 22 defines a particular downloading operation, namely downloading an on-line financial statement of original payee names from an on-line banking service. In the absence of a suggestion by *Simmons* that the first data set is an on-line financial statement of original payee

names or a teaching by *Simmons* that the first processor is an on-line banking service, Applicants respectfully submit that this anticipation-type rejection is improper and request that the Examiner withdraw this rejection.

Claim 22 further requires determining that a first original payee name has been changed to a substitute payee name. In response to determining that this first payee name has been changed, the first payee name is replaced by the substitute payee name and this substitute payee name is displayed within a payee field of a display screen for each occurrence of the first payee name. Applicants respectfully submit that the remarks submitted above to distinguish the invention of Claim 1 over the *Simmons* patent are equally applicable to support a positive finding of patentability for the invention of independent Claim 22. In particular, automatically identifying discrepancies between a pair of data sets, as taught by the *Simmons* patent, does not suggest to one of ordinary skill in the art to determine that a first original payee name has been changed to a substitute payee name, as recited by Claim 22. Moreover, *Simmons* fails to suggest replacing a first payee name with a substitute payee name and displaying that substitute payee name within a payee field of a display screen *for each occurrence of the first payee name*.

In view of the foregoing, Applicants respectfully submit that the invention of Claim 22 is patentably distinct from the cited portions of the *Simmons* patent. The Examiner is respectfully solicited to withdraw the rejection of independent Claim 22, as well as all claims dependent therefrom, Claims 23-25.

Section 103

In numbered paragraphs 31-38 of the Official Action, the Examiner has rejected Claims 2-10, 12, 13, 21 and 25 under 35 U.S.C. § 103(a) as being obvious in view of the *Simmons* patent. In particular, the Examiner has alleged that one of ordinary skill in the art at the time of the invention would have found obvious modifying the *Simmons* patent to achieve the

invention of these claims. Applicants respectfully traverse this obviousness-type rejection because the Examiner has failed to provide proper support for a *prime facie* case of obviousness based on the *Simmons* patent. Although the Examiner has asserted that certain “obvious” modifications of the *Simmons* patent would result in the invention of Claims 2-10, 12, 13 and 25, Applicants submit that the Examiner has failed to provide the required support for the motivation for making such changes to the *Simmons* patent. In the absence of such motivation, the rejection of Claims 2-10, 12, 13 and 25 is improper and should be withdrawn.

Claims 2, 4, 6 and 8

The Examiner has alleged that the *Simmons* patent teaches all of the recitations of Claim 2, 4, 6 and 8, with the exception that this reference fails to suggest the use of a third field parameter in the manner defined by these claims. Nevertheless, the Examiner has taken “Official Notice” that the incorporation of multiple field parameters using links is common practice in the art of spreadsheets and, in view of this practice, one of ordinary skill in the art would have found it obvious to modify the *Simmons* patent to incorporate such multiple field parameters and thereby achieve the recited invention of Claims 2, 4, 6 and 8.

Contrary to the Examiner’s assertion, there is no suggestion by *Simmons* to modify the described electronic checkbook with automatic reconciliation to include multiple field parameters using links in the manner described by the Examiner to obtain the invention of Claims 2, 4, 6 and 8. Moreover, the Examiner has failed to provide any support for why one of skill in the art would be motivated at the time of the invention to make such a modification of *Simmons*. Applicants further traverse the Examiner’s allegation that the second field parameter of Claims 2, 4, 6 and 8 has the same function as the third field parameter recited by these Claims. The Examiner has admitted that *Simmons* fails to describe or teach the third field parameter defined by Claims 2, 4, 6 and 8, and the allegation that the second field parameter recited by these claims is the

functional equivalent of the recited third field parameter is an unsupported allegation. Because the Examiner has failed to satisfy the Patent Office's burden of presenting an obviousness-type case, Applicants respectfully request that the Examiner withdraw the rejection of independent Claims 4 and 8 and dependent Claims 2 and 6. Moreover, Applicants further request that the Examiner withdraw the rejection of Claims 5-7, which depend from independent Claim 4, and Claim 9, which depends from independent Claim 8.

Applicants also respectfully submit that the Examiner's reliance upon the remarks of paragraph 20 of the Official Action in support of the rejection of independent Claims 4 and 8 is misfounded because these remarks fail to address certain recitations of these independent claims, namely steps c and e of independent Claim 4 and tasks f and i of independent Claim 8. Because numbered paragraph 20 of the Official Action is primarily directed to the recitations of Claim 21, these remarks do not encompass the additional recitations of independent Claims 4 and 8. Applicants respectfully submit that the *Simmons* patent fails to describe or suggest eliminating a link from a first field parameter to a second field parameter, and creating a link from the first field parameter to the third field parameter, in the event that the first field parameter has a link to the second field parameter, as required by Claims 4 and 8. Moreover, *Simmons* fails to teach eliminating a link from a first field parameter to a third field parameter, deleting that third field parameter, and displaying a first field parameter in the event that the first field parameter is the same as the third field parameter, as recited by Claims 4 and 8. Because the inventions of Claims 4 and 8 are patentably distinguishable from the *Simmons* patent, Applicants respectfully request that the Examiner withdraw the pending rejection and pass these claims to allowance, as well as all claims dependent therefrom.

Independent Claim 10

The Examiner has asserted that the *Simmons* patent teaches all of the recitations of independent Claim 10, with the exception that this patent fails to suggest the use of active and dummy tables in the manner defined by this claim. Nevertheless, the Examiner has asserted that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify the first and second data sets of *Simmons* for use as active and dummy tables to achieve the invention defined by Claim 10. Applicants respectfully submit that this obviousness-type rejection is improper because the Examiner has failed to support this rejection by providing a motivation for why one of ordinary skill in the art would have modified the first and second data sets of the *Simmons* patent to achieve the invention defined by Claim 10. There is no suggestion in the *Simmons* patent to make this modification. Moreover, Applicants traverse the Examiner's allegation that the first and second data sets of *Simmons* are the equivalent of active and dummy tables recited by Claim 10.

Applicants further submit that the remarks presented above with regard to the patentability of the invention defined by independent Claim 8 in view of the *Simmons* patent are equally applicable to overcoming the rejection of independent Claim 10. In view of the foregoing, Applicants respectfully request that the Examiner withdraw the rejection of independent Claim 10 and all claims dependent therefrom, including Claims 12 and 13.


In summary, Applicants respectfully submit that the inventions defined by Claims 1-20 and 22-25 are patentable over the *Simmons* patent. Applicants respectfully request that the Examiner withdraw the pending rejection and pass these claims to allowance.

CONCLUSION

The foregoing is submitted as a full and complete response to the Official Action mailed August 31, 1998. Applicants thank Examiner Marsh for his consideration of these amendments. Applicants have shown above that Claims 1-20 and 22-25 are allowable over the art cited by the Examiner and such action is respectfully requested.

If the Examiner believes there are any issues that can be resolved by a telephone conference, or that there are any informalities that can be corrected by an Examiner's amendment, a telephone call to the undersigned at 404.818.3700 to discuss same is respectfully requested.

Respectfully submitted,


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